

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

LUIS ACEVEDO GARCIA, et als PLAINTIFFS	CASE NO. 97-2639 (JP)
---	-----------------------

VS.

MUNICIPIO DE ADJUNTAS, et als DEFENDANTS	
---	--

NOTICE & MOTION

TO THE HONORABLE COURT:

COMES NOW the Undersigned counsel and respectfully **NOTIFY AND REQUEST:**

1. During the course of our preparation for trial¹ the undersigned found several discrepancies in the personal files of the Plaintiff.
2. In that Request to Admit are not within the scope of discovery requests, a short plea for requests to admit are in order.
3. The requests are relevant and in order in that the answer tendered willen route this matter to a faster and less expensive trial proceeding.

¹The undersigned have not yet been advised the results the request for settlment funds from the Dept. Of Justice, Commonwealth of Puerto Rico.

WHEREFORE it is respectfully requested that be granted to draft and tender a short requests to admit the plaintiffs.

In Ponce for San Juan, Puerto Rico this 26 of May 2006.

I hereby **CERTIFY** that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Luis V. Villares-Sarmiento, Esq., Sanchez, Betances & Sifre, PO Box 195055, San Juan, PR 00919-5055; and to Israel Roldan-González, Esq., 44 Progreso Street, Aguadilla, PR 00603.

RESPECTFULLY,

S/Harry R. Segarra

Harry R. Segarra

USDC-PR 122511

Santa Maria Mall

471 Ferrocarril Ave. - Suite 207

Ponce, Puerto Rico 00731

Tel. (787) 848-8113

Fax. (787) 843-6717

eqclaw@centennialpr.net